

CAUSE NO. 2019-34964

BILLY JOHNSON
Plaintiff,

§ IN THE DISTRICT COURT

VS. §

§ OF HARRIS COUNTY, TEXAS

SAN JACINTO COLLEGE
Defendant.

§ 215th JUDICIAL DISTRICT

JOINT MOTION FOR CONTINUANCE

Plaintiff Billy Johnson and Defendant San Jacinto College (“College”) file this Joint Motion for Continuance, and would show the Court as follows:

1. This is an employment civil rights suit. The following deadlines remain in this case:

Discovery deadline:	6/1/2020
Alternative Dispute deadline:	7/6/2020
Dispositive Motions deadline:	8/3/2020
Trial setting:	9/14/2020

2. The parties have been diligently working on discovery in this case. Unfortunately, the COVID-19 pandemic and the resulting stay-at-home orders resulted in the closure of the offices for counsel for the College, which led to a delay in the production of a large number of emails to the Plaintiff. Counsel for the College had intended to take the Plaintiff’s deposition, but did not feel that it was fair to take his deposition before they were able to produce the requested emails. Also, counsel for the Plaintiff has several depositions that she wanted to take, but needed the emails before she could take depositions. Therefore, as a result of the pandemic and the resulting stay-at-home orders, the parties have been unable to get to deposition in this case.

EXHIBIT G

3. Accordingly, the parties are requesting a roughly additional ninety (90) days to finish discovery in this case. The parties are also requesting that the case be moved from the September 2020 trial docket to the February 2021 trial docket (or later, depending on the Court's need to accommodate its own scheduling issues caused by the COVID-19 pandemic), based on conflicts that they have in December 2020 and January 2021. This would result in the following schedule.

Discovery deadline:	September 4, 2020
Alternative Dispute deadline:	October 9, 2020
Dispositive Motions deadline:	November 6, 2020
Trial setting:	February ___, 2021

4. This is both parties' first request for a continuance. This request is not sought for delay, but so that justice may be done.

PRAYER

For the reasons stated above the Plaintiff and the Defendant respectfully move that this Court continue the various settings as discussed above; and for all other relief, at law or in equity, to which the parties may be entitled.

Respectfully submitted,

AH LAW, PLLC

By: /s/ Amanda Hernandez¹
Amanda Hernandez
State Bar No. 24064411

4309 Yoakum Blvd.
Houston, TX 77006
(713) 409-2719
(832) 550-2073 fax
amanda@ahfirm.com

ATTORNEYS FOR THE PLAINTIFF

¹ By permission. /s/ Christopher B. Gilbert

THOMPSON & HORTON LLP

By: /s/ Christopher B. Gilbert
Christopher B. Gilbert
State Bar No. 00787535
cgilbert@thompsonhorton.com
Melissa A. Mihalick
State Bar No. 24045589
mmihalick@thompsonhorton.com
Stephen A. Villarreal
State Bar No. 24102609
svillarreal@thompsonhorton.com

3200 Southwest Freeway, Suite 2000
Houston, Texas 77027
Telephone: (713) 554-6767
Facsimile: (713) 583-8884

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been forwarded to counsel of record via electronic mail on May 30, 2020, at the following address:

Amanda Hernandez
AH Law, PLLC
4309 Yoakum Blvd.
Houston, TX 77006
Attorney for the Plaintiff

By: /s/ Christopher B. Gilbert
Christopher B. Gilbert